

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	
Disabilities)	
 Interstate Telecommunications Relay Service)	
(TRS) Fund Advisory Council Files Proposed)	
Guidelines for the Recover of Costs)	
Associated with Internet Protocol)	
Relay Services)	

**REPLY COMMENTS
WORLDCOM, INC.**

On October 9, 2002, the Interstate Telecommunications Relay Service (“TRS”) Advisory Council submitted to the Commission recommended guidelines to govern the recovery of costs associated with Internet Protocol Relay (“IP Relay”) service.¹ Three relay providers,

¹ Interstate TRS Advisory Council, Recommended Internet Protocol (IP) Cost Recovery Guidelines (“Recommended Guidelines”), CC Docket No. 98-67, October 9, 2002.

WorldCom, Sprint, and AT&T, and the National Exchange Carrier Association (NECA) filed comments.² WorldCom takes this opportunity to respond to those comments.

The relay providers all support NECA's October 9, 2002 findings. In particular they all support the NECA's recommendation to apply the same national average rate development methodology and cost recovery reimbursement rate for traditional relay service to IP Relay service. WorldCom therefore recommends the Commission adopt this finding.

In its October 9, 2002 report, NECA recommended periodically revisiting IP Relay cost recovery to determine if changes in technology or other circumstances made it possible or desirable for reimbursement to be shared between the Federal and State jurisdictions.³ AT&T appears to misread this recommendation, and proposes the Commission undertake an annual review of whether the interstate reimbursement rate for IP Relay should continue to be identical to the interstate reimbursement rate for traditional relay.⁴ NECA did not recommend periodic review for this issue. Rather, NECA found that because the cost drivers of IP Relay were nearly identical to traditional relay it did not expect their costs to differ.⁵ WorldCom does not see the need for NECA to perform a review comparing the cost of providing IP Relay to traditional relay, until and unless it, or a relay provider, suspects that cost conditions between the two relay access methods are about to significantly diverge. WorldCom recommends that NECA and relay

² See Interstate Telecommunications Relay Service TRS Fund Advisory Council Files Proposed Guidelines for the Recover of Costs Associated with Internet Protocol Relay Services, CC Docket No. 98-67, Comments of WorldCom ("WorldCom Comments"), filed February 7, 2003, Comments of Sprint ("Sprint Comments"), February 7, 2003, Comments of AT&T ("AT&T Comments"), filed February 7, 2003, and Comments of NECA, filed February 7, 2003.

³ Recommended Internet Protocol (IP) Cost Recovery Guidelines, CC Docket No. 98-67 ("NECA IP Cost Recovery Guidelines"), October 9, 2002, at 14.

⁴ AT&T Comments at 5.

⁵ NECA IP Cost Recovery Guidelines at 13-14.

providers continue to share information and concerns about IP-Relay on an informal basis. A more formal review by NECA would be appropriate if informal information point in that direction.

In its Comments, NECA identifies the possibility of fraud associated with international calls completed over IP Relay. Based on data submitted by IP Relay providers, NECA reports that international IP minutes have been exceeding traditional relay international minutes by a factor of 20.⁶ Some increase in international IP minutes compared to traditional relay would be expected, because IP Relay providers have not been charging callers for the toll portion of the call.⁷ However, due to the magnitude of the increase, WorldCom believes that significant numbers of international calls carried over IP Relay should not be eligible for reimbursement.

WorldCom believes that since the appeal of free international calling is responsible for the probable fraud associated with international IP Relay, the appropriate response is to remove the incentive to commit fraud caused by free international IP Relay calling. As Sprint notes, the Commission's rules only require free toll calls over IP Relay if the relay provider does not offer the caller the ability to choose the long distance carrier of his or her choice.⁸ If relay providers do offer callers this ability, and then charge for the call, the incentive to commit fraud should be eliminated. Sprint suggests that in the context of IP Relay, the carrier of choice obligation would be satisfied if relay providers allow callers to utilize calling card, collect, prepaid cards, and third party billing methods.⁹ WorldCom supports this proposal. WorldCom believes that the Commission's carrier of choice rules would only apply to calls that originate in the United States

⁶ NECA Comments at 4.

⁷ WorldCom has not sought reimbursement for the relay portion of international IP Relay calls.

⁸ Sprint Comments at 2.

⁹ *Id.*, at 2.

and its territories, since the toll portion of an internationally originated toll call would normally be billed by the foreign caller's long distance provider.

Respectfully Submitted,

Larry Fenster

Larry Fenster
1133 19th St., NW
Washington, DC 20036
202-736-6513

Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on March 10, 2003

Larry Fenster

Larry Fenster
1133 19th St., NW
Washington, DC 20036
202-736-6513

Service List

I hereby certify that on March 10, 2003, a copy of these Reply Comments was delivered by first-class mail, or email, to the following parties:

Peter Jacoby
AT&T Corp.
Room 3A251
One AT&T Way
Bedminster, NJ 07921

Richard Askoff
National Exchange Carrier Association
80 South Jefferson Road
Whippany, NJ 07981

Michael Fingerhut
Sprint Corporation
Suite 400
401 9th St., NW
Washington, DC 20004

Margaret Egler*
Deputy Chief
Consumer Governmental Affairs Bureau
Federal Communications Commission

Thomas Chandler*
Chief, Disability Rights Office
Consumer Governmental Affairs Bureau
Federal Communications Commission

Pam Gregory*
Disability Rights Office
Consumer Governmental Affairs Bureau
Federal Communications Commission

Qualex International*

L. Elizabeth Bryant

L. Elizabeth Bryant

* Delivered via email